

International Programs Non-Development Activity Policy

Policy Statement

Transform Aid International Ltd (“TAI”) is committed to ensuring that our international programming is consistent with our Vision, Mission, and Values, and informed by a human rights and strengths-based approach. This Policy outlines the distinction between development activity and non-development activity and the appropriate treatment of each.

Development activities are those which are based on the principles of participation, equity, non-discrimination, accountability and sustainability. Non-development activities are those which include religious activities / evangelism, partisan political activities, and welfare activities. Each of these principles are defined in the Definitions section below.

TAI’s commitment to supporting development activity and distinguishing it from any non-development activity is demonstrated by being a signatory and member of the Australian Council for International Development (ACFID) Code of Conduct, and status as a Fully Accredited NGO of the Department of Foreign Affairs and Trade (DFAT).

Scope and Purpose

This Policy applies to all projects and activities undertaken by TAI, including community development and disaster management projects.

The purpose is to ensure that funds provided to TAI are used in a transparent manner consistent with the intent for which they were given, and directed to activities that do not intentionally favour individuals or communities based on political or religious lines nor keep them in a state of dependence on welfare.

This Policy extends to TAI’s partners and implementing organisations.

Policy Objectives

The objectives of this Policy are:

1. To address the separation of development (and humanitarian) activities from non-development activities and ensure that this clear separation is reflected in the relevant procedures and processes.



2. To ensure accurate representation of our activities to the people and partners we work with, communities we serve and the general public.
3. Address TAI's ACFID compliance obligations when communicating with or soliciting donations from private donors and the public, including fundraising for restricted and unrestricted purposes from aid agencies, sponsors and supporters, and fundraising from the general public.

Guiding Principles

In our Project Agreements, TAI explicitly stipulates:

Ensure that Project Funding is not used to support programs and/or staff or others that involve any Non-Development Activity as per TAI's Non-Development Activity Policy.

TAI is committed to abiding by the following principles.

1. TAI is committed to ensuring accurate representation of our activities to the people and partners we work with, communities we serve and the general public.
2. TAI will ensure that funds raised for aid and development purposes are not used to exploit people and communities who are vulnerable, and do not place any conditions or obligations on recipients in terms of non-development, religious or political outcomes that would affect their access to services being offered.
3. TAI is committed to ensuring that funds and other resources designated for the purpose of aid and development are used only for those purposes. The concept of aid and development activities can be distinguished by the following principles:
 - a. Strengths-based approaches which encourage people and communities to create solutions for themselves.
 - b. Processes that seek to address the causes of poverty.
 - c. Processes that seek to empower rights holders to claim their rights and ensure that duty bearers exercise their duties.
 - d. Supporting systems and structures which enable people to move out of poverty.
 - e. Humanitarian response and emergency relief, disaster recovery and meeting the immediate needs of refugees and internally displaced people.



- f. The principles of participation, equity, non-discrimination, accountability and sustainability.
4. TAI does not provide support for evangelical activities, partisan political activities or welfare activities, and consider them to be non-development activities.
 - a. Religious / evangelical activities are those activities that promote a particular religious adherence or are undertaken with the intention of converting individuals or groups into a particular faith and/or denominational affiliation. This includes missionary activities (see Definitions).
 - b. Partisan political activities are those that are associated with facilitating or supporting a specific political party, a candidate to gain power or to support an organisation affiliated with a political party. This does not include advocacy which is aimed at persuading and influencing decision makers and opinion leaders, and is not aimed at promoting partisan political objectives.
 - c. Welfare activities aim to maintain people in a particular condition on a longer-term basis. Substantial and broad impact on social and economic conditions in the community are not normally expected from welfare programs. Welfare may be provided to an individual or family basis including home-based and institutional care programs, such as those provided by orphanages, homes for the elderly, hospices and the provision of food for those who are destitute. (Note: assistance and/or assistive devices provided to people with disability and the elderly to enable their participation in community and development activities (as part of a wider project) should not be considered welfare.)
5. TAI will reflect this separation in our project selection criteria and in partnership/project documentation with our partners (Project Agreements etc) to ensure such separation extends to partner organisations.
6. TAI will observe the following procedures for separation of development and non-development in programs and projects:
 - a. Appraise all project proposals to determine whether they include non-development components and ensure policy requirements are satisfied before the project is approved.
 - b. Record any aspects of the project that should be closely monitored over the life of the project to ensure compliance with this Policy.



- c. Identify whether an implementing partner is engaged in non-development activities, and if so, how it is able to manage and account for them separately to development activity.
 - d. Components of projects that represent non-development activity will be managed, reported and accounted for separately to aid and development components.
7. TAI will observe the following actions for extending the separation of development and non-development activities to partners:
- a. Communication with potential / new partners will state TAI's position on support for non-development activity.
 - b. All implementing partners will receive a copy of this Policy.
 - c. Partner documentation (such as Project Agreements) will include clear definitions of development activity and non-development activity.
 - d. Partner documentation will require the partner to agree that TAI funds designated for development and humanitarian purposes will not be used to fund any non-development activity.
 - e. TAI will engage in ongoing dialogue with its partners to reinforce the definitions of development and non-development activity, and the need for a separation between development and non-development activity.
8. TAI will observe the following actions regarding communication and fundraising:
- a. Review communications and fundraising materials prior to publication to ensure separation of communicating, reporting and fundraising for development and non-development activities.
 - b. Any funds raised for non-development activity will be tracked, managed, reported and accounted for separately to those raised for development and humanitarian components.



Responsibilities

Responsibility for the operationalisation of this Policy lies with Director of International Programs, with input from the Director of Marketing and Communications, Director of Constituent Relations and Director of Advocacy. A review is conducted annually by the Finance Department to confirm the correct use of expenditure; the findings are communicated to the Director of International Programs as a safety check to ensure that the non-development activity definition is adhered to and any issues are addressed promptly.

This Policy is available on TAI's intranet.

This Policy is reviewed triennially, or sooner as required.

Confirmation of internal compliance with this policy will be undertaken at least once annually.

Introduction of the policy will be included in the induction process, to be read by all new staff.

A workshop will be regularly organised to present the policy to staff and keep them updated on any changes.

Definitions

Accountability – Accountability is the processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision-making processes and activities, and delivers against this commitment.”¹

Development- Improving the conditions of communities in a sustainable way (change that is lasting and durable). It is based on working with communities, rather than for or on behalf of communities.

Development and humanitarian initiatives - Activities undertaken in order to reduce poverty and address global justice issues. In the non-government organisation sector, this may occur through a range of engagements that includes community projects, humanitarian response and emergency management, community education, advocacy.

Equity and Non-Discrimination - TAI acknowledges that all human rights are indivisible, universal, and inalienable. There is an obligation stated in all human rights instruments that equal rights and opportunity should be given to all people.

Evangelism - Evangelical activities are those activities that promote a particular religious adherence or are undertaken with the intention of converting individuals or groups into a particular faith, religion or denominational affiliation.

¹ One World Trust, "Pathways to Accountability", 2005, 20.

Human Rights Based Approach to Development - An approach that frames development within the international human rights conventions. Social, Economic and Cultural rights are often focussed on by development agencies. Indicators of success are generally the extent of change in the fulfilment and respect of specific human rights rather than needs.

Humanitarian Activities / Response: Action taken with the objective of saving lives, alleviating suffering and maintaining human dignity during and after human-induced crises and natural disasters, as well as action to prevent and prepare for them.

Missionary Activities - Includes evangelism but also extend to activities designed to build up the knowledge and faith of believers. They include theological and bible training and studies.

Religious Activities - Religious activities are defined as supporting or promoting a particular religion, including activities undertaken with the intention of converting individuals or groups to a particular faith and/or denomination. Activities that build up religious structures (including infrastructure, training or organisational activities) are considered 'religious activities', unless those structures are specifically designed to provide non-denominational development outcomes.

Sustainability - Sustainable outcomes will seek to ensure that the benefits of any intervention continue beyond the life of the project by building the capacity of the targeted community. Sustainable development activities will "meet the needs of the present without compromising the ability of future generations to meet their own needs."²

Participation - Promoting the empowerment of stakeholders in each development project. Participation concerns the way in which an organisation involves stakeholders in its decision-making processes and activities. Participation gives stakeholders a voice in the activities of the organisation, creating ownership of the results and a greater likelihood of the uptake and legitimacy of the research.³

Political Activities - Those associated with the partisan political operations of political parties and/or governments. Some examples of political activities include: NGO staff being involved in party political activities; using funds or resources to facilitate or support a specific political party, candidate, or party political organisation in a local, regional or general / national election; using funds or resources to facilitate or support independence or separatist movements; using funds or resources to facilitate or support a particular politician or faction to gain power within a government or within a political party structure.

Recognised Development Expenditure (RDE) - The total eligible contribution that each NGO receives from the Australian community for the organisation's own development assistance, emergency relief or rehabilitation activities overseas and development education in Australia. Eligible contributions include donations of cash,

² The World Commission on Environment and Development (1987).

³ Accountability Principles for Research Organisations, One World Trust, Briefing Paper No. 113, November 2008.

gifts in kind and volunteer services. Up to half of the RDE can be for eligible gifts in kind and/or eligible volunteer services.

Strengths-Based Approach - An approach to development that focuses on building on the existing strengths in communities, seeking to empower them to direct their own development priorities.

Welfare - Assistance to maintain people in a particular condition on a long-term basis, such as institutionalised care programs as provided by orphanages, homes for the elderly, support to the elderly, support to people with disability or the provision of food for the destitute. Welfare activities are typically implemented independently of other sustainable community development activities; include no strategy for integration into broader community development programs; are provided on an individual or family basis, rather than on a community basis, and are unconnected to emergency needs; and implemented on a long term basis with no clear exit strategy. (Assistance and/or assistive devices provided to people with disability and the elderly to enable their participation in community and development activities as part of a wider project should not be considered welfare).

Related Policies and Procedures

This Policy should be read in conjunction with the following:

- Marketing Non-Development Activity Checklist.
- TAI International Programs Human Rights Policy.
- Policy Development Policy.
- Policy Development Procedure.
- TAI International Programs Strategy 2018-2023.

External References

This Policy refers to the following:

- ACFID Code of Conduct (principle 7.3.2).
- DFAT Recognised Development Expenditure Explanatory Notes (2019).
- DFAT Overseas Aid Gift Deductions Scheme (2016).



International Programs Non-Development Activity Policy	
Owner	Director of International Programs
Master Copy	Policy QA Coordinator
Date created	2006
Date last reviewed	01/08/2020
Approved by Director of International Programs	23/09/2020
Approved by Executive	04/11/2020
Approved by Board	20/11/2015
Date next Review	04/11/2023

Date	Version	Revision Description	Reviewed / Updated by
2006	1	Policy created and known as “No Strings Attached – Non-Discrimination based on Religion”	Program Manager
04/05/2015	2	Reviewed and updated entire policy to ensure conformity with ACFID and DFAT compliance requirements	Director of Business
Nov 2015	3	Reviewed by PPC and updated (definitions; Sustainability and Equity & Non-Discrimination)	Director of International Programs
Nov 2015	4	Board amendments applied (No Strings Attached, uniform use of hyphen and capitals when “non-development” is referred to spelling errors & reference to correct Checklist)	Governance Coordinator
14/11/2016	5	Moved Policy to new TAI Template	Policy QA Coordinator
21/11/2016	6	Rectify typing errors and make Review Date biennially	Governance & Compliance Specialist
11/01/2017	7	Changed welfare definition from “support to the disabled” to “support to people with disability”	Director of International Programs and International Programs Manager – Grants



		Amended final sentence of paragraph one to updated list of non-development activities and remove redundant reference to “no strings attached”.	
14/11/2019	8	Updated with minor amendments	Policy QA Coordinator
23/09/2020	9	Reviewed and updated	International Programs Manager